

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

Michael Oyesiji Oyedele

Case No. 20-2087 (JS)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of in or about 6/2016 through 3/2020 in the county of Camden and Mercer in the
 District of New Jersey, the defendant(s) violated:

Code Section

18 U.S.C. § 1349

Offense Description

Conspiracy to commit bank fraud.
 (See Attachment A.)

This criminal complaint is based on these facts:

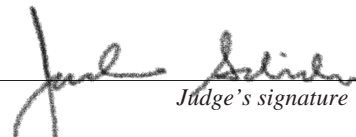
See Attachment B, Affidavit of probable cause.

☐ Continued on the attached sheet.*Complainant's signature*

Michael R. Durocher, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/24/2020City and state: Camden, NJ*Judge's signature*

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

By: *s/PATRICK C. ASKIN*
PATRICK C. ASKIN, AUSA

Date: June 24, 2020

Attachment A

(Conspiracy to Commit Bank Fraud)

From in or about June 2016 through in or about March 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL OYESIJI OYEDELE

did knowingly and intentionally conspire and agree with co-conspirators, and with others, known and unknown, to devise a scheme and artifice to defraud a financial institution, namely TD Bank and other victim banks, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of Victim Bank # 1 and other victim banks, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344, as described in Attachment B.

In violation of Title 18, United States Code Section 1349.

ATTACHMENT B

I, Michael Durocher, am a United States Postal Inspector assigned to the Philadelphia Division of the United States Postal Inspection Service (USPIS), have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation, as well as upon information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a Criminal Complaint against Michael OYEDELE (hereafter "OYEDELE"), I have not necessarily included each and every fact known to the Government concerning this investigation.

1. On or about August 16, 2017, a Victim Bank 1 Investigator contacted the United States Postal Inspection Service (USPIS) concerning several bank accounts that were closed by Victim Bank 1 due to suspected fraudulent activity. A Victim Bank 1 representative made USPIS aware the accounts were opened using suspected fraudulent foreign passports and United States Visas at Victim Bank 1 branches located in New Jersey and Pennsylvania. After they were opened, the accounts had minimal activity during the first two months. Any initial activity consisted of Western Union, MoneyGram, US Postal money orders, or cash deposits. After the two month period, individuals deposited large business checks into the account and quickly withdrew the funds, either by ATM withdrawals or by purchasing money orders at various money order vendors such as grocery and discount stores. Shortly after the checks were deposited,

Victim Bank 1 began to receive claims stating the checks were stolen and the payee section was altered to show someone that was not intended to receive the check. Although the payee on the check was altered, the amount on the check was not changed. By October 2017, this affiant identified over thirty (30) fraudulent accounts with a total exposure of approximately \$800,000 to several financial institutions.

2. In the initial stages of the investigation, this affiant discovered at least twenty seven (27) fraudulent bank accounts that were opened between July 2016 and March 2017. The accounts were opened at numerous financial institutions in the state of New Jersey under the assumed names of Wunmi Akrana, Emanuel Kuti, Olawale Johnson, Steven Akpan, Olawole Adefarasin, and Anthony Tunde Camara. In addition, law enforcement identified Co-Conspirator 1 as the individual that opened the Olawale Johnson and Anthony Tunde Camara accounts. As the investigation progressed and additional fraudulent accounts were identified, law enforcement discovered the pattern of activity moved from New Jersey to Pennsylvania, Rhode Island, and Maryland.

3. Between September 13, 2017 and September 14, 2017, this affiant contacted the payer on several checks suspected of being altered and deposited into accounts that were closed by the bank for suspected fraud. The interviews confirmed the payee's name was altered on all of the checks to reflect the name used on a fraudulent account. The accounts to which these checks were deposited were opened in the assumed names of Solomon Henry, Moussa Johnson Traore, Rasheed Williams, Banji Aiwanfo, and John Anoliefo.

4. This affiant examined the bank accounts referenced in paragraph 3 and discovered the accounts were opened using foreign passports, each containing United States Visas, which were believed to be counterfeit.

5. On or about November 17, 2017, this affiant met with Department of State - Diplomatic Security Service (DSS) to discuss the passports and United States Visas used to open the fraudulent bank accounts. A Special Agent (SA) from DSS confirmed the passports and United States Visas were counterfeit and the identifiers on the documents did not match any Consular records in the Department of State's systems.

6. During the summer of 2018, Co-Conspirator 1 was identified and linked to the use of funds from a fraud account, under assumed name Victim Individual 1, to purchase a money order. The money order was used to purchase a vehicle from Copart and ultimately, the vehicle was exported to Africa. Co-Conspirator 1 used his business profile and driver's license to conduct the purchase of the vehicle.

7. On or about August 8, 2018, this affiant contacted HSI to assist with the investigation. A review of their databases revealed that Co-Conspirator 1 appeared in a HSI investigation out of Pittsburgh, PA. In the Pittsburgh investigation, two fraudulent Gambian passports destined for Altoona, PA were intercepted by United Kingdom Border Force ("UKBF") and sent to the HSI Pittsburgh Field Office for further investigation. HSI Pittsburgh utilized the assistance of the HSI Forensic Lab to forensically analyze the documents.

Through their analysis, the lab was able to identify the images on the documents as Co-Conspirator 1 and Co-Conspirator 2 in the investigation.

8. On or about February 2, 2018, HSI Pittsburgh linked a second seizure that was intercepted by Customs and Border Protection (CBP). CBP seized two fraudulent Gambian passports destined for Anthony Camara at 2209 Alfred Drive, Apt #A, Yeadon, PA. One individual depicted on the passport was identified as Co-Conspirator 2 referenced in paragraph 7. The other individual remains unidentified at this time.

9. On or about August 29, 2018, law enforcement used a public database available to law enforcement to conduct research on the 2209 Alfred Drive, Apt #A, Yeadon, PA address. The aforementioned address was the destination address for some of Co-Conspirator 2's fraudulent passports. While researching the address, law enforcement identified OYEDELE as residing at this address. This affiant ran OYEDELE's Pennsylvania DMV information and obtained an image of OYEDELE that matched bank video footage related to the fraud. Furthermore, the address on OYEDELE's driver's license was 2209 Alfred Drive, Apt A, Yeadon, PA.

10. In late August, 2018, this affiant was notified by HSI of a seizure of two (2) fraudulent West African passports. In September 2016, CBP intercepted a package at the DHL mail facility at JFK, which contained two counterfeit passports with counterfeit visas in the names of Kwame Johnson and Samuel Martins. With assistance from the HSI Forensic Lab, both identities were identified as OYEDELE. The shipment originated from Lagos, Nigeria and was

destined for “Mike Dele” at 120 Branford Drive, Darby, PA. It had an associated phone number of (267) 460 3735.

11. On or about April 11, 2019, T-Mobile provided subscriber information for the (267) 460 3735 phone number and the documents listed OYEDELE as the subscriber. In addition, this affiant subpoenaed OYEDELE’s personal bank accounts, all listed in the name of Michael Oyedele, and discovered the aforementioned phone number was listed on the following accounts: JP Morgan Chase account X3597, Santander Bank account X1721, X4726, and X4327, and Wells Fargo Bank account X2530 and X2986.

12. On February 3, 2019, Co-Conspirator 1 arrived at Newark International Airport on Ethiopian Airways flight 508 and was selected for a secondary examination by CBP. USPIS and HSI were present for the exam. Three (3) cellphones were imaged and seized by law enforcement for further analysis.

13. After analyzing the devices from the secondary examination, law enforcement discovered a computer screenshot that listed the identifiers for the assumed name Anthony Sarkodee, the accounts and account numbers that were opened using the fraudulent Anthony Sarkodee Ghanaian passport, and the security answers for those accounts. In addition, an image of the fraudulent Anthony Sarkodee Ghanaian passport with OYEDELE’s image on it was discovered during the examination.



14. After an analysis of bank records, this affiant discovered OYEDELE opened approximately eight (8) accounts on March 21, 2017 under the assumed name of Anthony Sarkodee for an estimated intended loss of \$84,593.05. OYEDELE utilized a fictitious West African passport in the assumed name of Anthony Sarkodee bearing his image to open the aforementioned accounts. This affiant obtained a copy of the above passport and video footage from the banks, which showed OYEDELE as the individual that opened the accounts. The accounts are listed below:

<u>Date of Account Opening</u>	<u>Bank</u>	<u>Account Numbers</u>	<u>Amount</u>	<u>Assumed Name</u>
3/21/2017	Victim Bank 1	X6560	\$22,720.20	Anthony Sarkodee
3/21/2017	Victim Bank 5	X6823	\$15,454.00	Anthony Sarkodee
3/21/2017	Victim Bank 2	X1208, X1305	\$25,072.11	Anthony Sarkodee

3/21/2017	Victim Bank 4	X6380	\$11,746.74	Anthony Sarkodee
3/21/2017	Victim Bank 3	X8672, 8699, X8701	\$9,600.00	Anthony Sarkodee

Furthermore, law enforcement obtained images provided by the banks of OYEDELE conducting approximately \$34,371.26 worth of transactions on the following additional fraudulent accounts:

<u>Date</u>	<u>Bank</u>	<u>Type of Transaction</u>	<u>Amount</u>	<u>Assumed Name</u>
3/8/2017	Victim Bank 1	Deposit	\$10,566.07	Johnson Samuel Okorochoa
11/24/2017	Victim Bank 1	Deposit	\$40.00	Davies Bruno Yeboah
1/23/2018	Victim Bank 1	Deposit	\$20,035.19	Davies Bruno Yeboah
3/3/2018	Victim Bank 2	Deposit	\$500.00	Davies Yeboah
3/3/2018	Victim Bank 2	Withdrawal	\$500.00	Davies Yeboah
3/9/2018	Victim Bank 2	Withdrawal	\$460.00	Davies Yeboah
4/19/2018	Victim Bank 4	Deposit	\$150.00	Davies Bruno Yeboah
4/19/2018	Victim Bank 2	Withdrawal	\$800.00	Davies Yeboah
4/19/2018	Victim Bank 2	Withdrawal	\$200.00	Davies Yeboah
4/20/2018	Victim Bank 4	Withdrawal	\$120.00	Davies Bruno Yeboah
4/20/2018	Victim Bank 2	Withdrawal	\$800.00	Davies Yeboah

4/20/2018	Victim Bank 2	Withdrawal	\$200.00	Davies Yeboah
-----------	---------------	------------	----------	---------------

15. On January 8, 2019, OYEDELE arrived at John F Kennedy International Airport in New York City on Norwegian Air flight 7015 from London, UK and was selected for a secondary examination by CBP. OYEDELE presented CBP with his US passport, ending in 7441. CBP found three Nigerian passports that belonged to OYEDELE. OYEDELE stated he had two residences. The first residence was 2209 Alfred Drive Apt A, Yeadon, PA 19050 and OYEDELE said his wife and two children lived at that address. The second residence was 1325 Daja Lane Apt 2405, Grand Prairie, TX 75050. OYEDELE said he worked as a technician for BP Aerospace and resided at the second residence while he was working in Texas. CBP cleared OYEDELE for admittance into the United States and allowed him to continue onto his flight to Texas.

16. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that from in or about June 2016 to in or about March 2020, in the District of New Jersey and elsewhere, OYEDELE conspired and agreed, with others, known and unknown to the United States, to commit bank fraud, contrary to Title 18, United States Code, Section 1344, in violation of Title 18, United States Code, Section 1349.

17. To date, the investigation has revealed that the full extent of the criminal activity identified thus far involves approximately four hundred seventy

(470) fraudulent bank accounts with an estimated exposure of \$5.7 million. OYEDELE conspired with individuals both known and unknown commit the federal offenses outlined in the aforementioned paragraph.



Michael R. Durocher
U.S. Postal Inspector

Pursuant to F.R.Crim.P. 4.1, U.S. Postal Inspector Durocher was sworn and attested to the contents of this affidavit in support of the complaints.



HONORABLE JOEL SCHNEIDER
United States Magistrate Judge

Date: June 24, 2020